

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,
Plaintiff,

v.

ALEXIS MANUEL REYES-CORREA,
Defendant.

CRIMINAL NO. 24-458 (JAG)

UNITED STATES' SENTENCING MEMORANDUM

TO THE HONORABLE COURT:

COMES NOW the United States of America, by and through the undersigned attorney, respectfully states and prays as follows:

Introduction

1. On December 13, 2024, an Information was filed against defendant Alexis Manuel Reyes-Correa ("Defendant") charging him in Count One with being a prohibited person in possession of a firearm and ammunition, in violation of 18 U.S.C. § 922(g)(1). (ECF No. 2). On the same day, pursuant to a plea agreement, Defendant pled guilty to the sole count of the Information. (ECF Nos. 4-6). In the plea agreement, the parties agreed to (a) a total offense level of 17 and (b) recommend a sentence of imprisonment at the lower end of the applicable Guidelines range at a total offense level of 17 when combined with the criminal history category determined by the Court. (ECF No. 4, p.4). The parties also agreed that upon Defendant's revocation of

supervised release in Criminal No. 18-766 (JAG), the parties would be free to argue whether the sentence in that case run *consecutively* or *concurrently* to the sentence imposed in this case. *Id.* Given Defendant's criminal history category is III and the stipulated total offense level is 17, the applicable guidelines range recommended by the parties is a term of imprisonment of 30 to 37 months.

2. After consideration of the relevant factors enumerated in 18 U.S.C. § 3553(a), the Government requests Defendant be sentenced to 30 months, to run *consecutively* to the sentence imposed on Defendant's revocation of supervised release in Criminal No. 18-766 (JAG).

Discussion

3. In determining the appropriate sentence, the court must consider the following factors:

(1) the nature and circumstances of the offense and the history and characteristics of the defendant; (2) the need for the sentence imposed — (A) to reflect the seriousness of the offense, to promote respect for the law, and to provide just punishment for the offense; (B) to afford adequate deterrence to criminal conduct; (C) to protect the public from further crimes of the defendant; and (D) to provide the defendant with needed educational or vocational training, medical care, or other correctional treatment in the most effective manner; (3) the kinds of sentences available; (4) the kinds of sentence and the sentencing range established for — (A) the applicable category of offense committed by the applicable category of defendant as set forth in the guidelines — (i) issued by the Sentencing Commission , , , ; and (ii) that, except as provided in section 3742(g), are in effect on the date the defendant is sentenced . . . ; (5) any pertinent policy statement . . . ; (6) the need to avoid unwarranted sentence disparities among defendants with similar records who have been found guilty of similar conduct; and (7) the need to provide restitution to any victims of the offense.

18 U.S.C. § 3553(a).

4. In the case at bar, the Government has considered the above § 3553 factors and believes that a sentence of 30 months is sufficient, but not greater than necessary, to reflect the seriousness of the offense, promote respect for the law, provide just punishment for the offense, afford adequate deterrence to criminal conduct and protect the public from further crimes of the defendant.

Conclusion

5. Based on the aforementioned, the Government recommends Defendant be sentenced to a term of imprisonment of 30 months.

WHEREFORE, the United States respectfully requests that this Honorable Court take note of the aforementioned.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 5th day of March, 2025.

W. STEPHEN MULDROW
United States Attorney

s/José A. Contreras
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 5 day of March, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties in this case.

s/José A. Contreras

José A. Contreras

Assistant United States Attorney